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March 27, 2020

VIA ECF

Hon. Barbara Moses
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Ruiz Rivera et al v. Polaris Cleaners 99, Inc. et al
CASE #: 1:18-cv-08817-RA-BCM

Your Honor:

My firm represents Plaintiffs in the above-referenced action. We write jointly with the Defense to respectfully request an adjournment in the time the parties may submit their Joint Pretrial Order.

The original date for submission of the Joint Pretrial Order is "30 days after the close of discovery," which is March 29, 2020. ECF No. 41. The original date for the submission was thirty days (30) after the end of There were previous requests for adjournment of the discovery deadline, which was granted on December 18, 2019, which would extend the time to submit the joint pretrial order. ECF No. 29 (discovery due 10/30/2019); 33 (discovery due by 1/13/2020); 41 (discovery due by 2/28/2020). The previous requests were granted.

The reason for the present request is that the parties have been engaged in extensive settlement discussions and have exchanged settlement materials. The parties are working amicably and diligently--but remotely in light of the 100% workforce reduction requirement due to the coronavirus--to resolve the instant action.

We respectfully request that the parties be permitted to submit a joint pretrial order on or before April 30, 2020.


The requested adjournment or extension does not affect other scheduled dates.

We thank the Court in advance for the time and consideration devoted to this matter.

Application granted. The parties' deadline to file their joint letter, Dkt. 44, is hereby adjourned to April 30, 2020, and the post-discovery conference is hereby adjourned to May 8, 2020 at 2 PM. In light of the Covid-19 crisis, the post-discovery conference will be held by telephone. The parties shall call the Court's conference line at (888) 363-4749, and enter Access Code 1015508, followed by the pound (#) key.
SO ORDERED.

Respectfully submitted,

By: Clifford Tucker
Clifford R. Tucker, Esq.


Hon. Ronnie Abrams
3/30/2020